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Attorneys for Defendant
AMERICAN HOME SHIELD CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

KELLY BRIGHT,

Plaintiff,

v.

AMERICAN HOME SHIELD
CORPORATION, a Delaware corporation,

Defendant.

CASE NO. 2:20-CV-02079-KJM-CKD

**JOINT REPORT FOLLOWING
COMPLETION OF VOLUNTARY DISPUTE
RESOLUTION PROGRAM, PURSUANT TO
LOCAL RULE 271 (O) AND STIPULATION
FOR EXTENSION OF TIME FOR
DEFENDANT TO FILE RESPONSIVE
PLEADING**

Pursuant to Local Rule 271(o), Plaintiff Kelly Bright and Defendant American Home Shield Corporation hereby submit a joint Voluntary Dispute Resolution Program (“VDRP”) Completion Report and joint stipulation to extend the time for Defendant American Home Shield Corporation to file its responsive pleading to the complaint as follows:

WHEREAS, Plaintiff filed a Complaint in this Court on October 16, 2020 (Dkt. No. 1) (the “Action”);

WHEREAS the Parties elected to participate in the VDRP and agreed to stay this action, including all discovery, until the conclusion of the VDRP (Dkt. Nos. 8, 9);

WHEREAS the Parties previously agreed to extend the time for Defendant’s responsive pleading to twenty-eight (28) days following the conclusion of the VDRP (Dkt. Nos. 8, 9);

WHEREAS On March 2, 2021, the parties participated in the VDRP session with Jeffrey Owensby on March 2, 2021, but the session did not result in resolution of this action;

WHEREAS the parties agree to further extend the time for Defendant’s responsive pleading by seven (7) days, to April 6, 2021; and

WHEREAS this stipulation is the third extension by the parties regarding Defendant’s responsive pleading and made in response to the Parties’ desire to meet and confer regarding Defendant’s anticipated motion to compel arbitration and to stay this action, in order to determine whether they can resolve the matter without motion practice;

THEREFORE, IT IS STIPULATED AND AGREED THAT, by and between the undersigned counsel, Defendant will file its responsive pleading to the Complaint, including a motion to compel arbitration of this Action, on or before April 6, 2021.

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1 Dated: March 30, 2021

2 NATALIA D. ASBILL-BEAROR
3 ROBIN K. PERKINS
4 PERKINS ASBILL, APLC

5 By: /s/ Natalia D. Asbill-Bearor
6 Natalia D. Asbill-Bearor
7 Attorneys for Plaintiff Kelly Bright

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11 By: /s/ Jesse A. Cripps
12 Jesse A. Cripps
13 Attorneys for Defendant
14 AMERICAN HOME SHIELD CORPORATION

15 IT IS SO ORDERED.

16 DATED: April 5, 2021.

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18 CHIEF UNITED STATES DISTRICT JUDGE
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